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May 21, 2002

HAND DELIVERED

Honorable Catherine C. Blake United States District Court Judge United States District Court for the District of Maryland 101 West Lombard Street Baltimore, Maryland 21201

RE:

Antwerpen Chevrolet, Ltd., et al. v. Resolution Providers, Inc., et al. Civil Action No. CCB-02-CV-1271

Dear Judge Blake:

I am writing on behalf of all parties in the above-captioned case. The individual defendants, Mark McDonald and Carol Stevens, were served later than the corporate defendant, and will not be filing a response to the Complaint until May 28, 2002. However, counsel for the corporate defendant also will be representing the two individual defendants.



Counsel for the parties have discussed your Scheduling Order, and would respectfully request certain modifications. Counsel believe that they will be able to consult with their clients and meet the deadline of May 29, 2002 with respect to a settlement conference, a report regarding deposition hours, and whether there is consent to proceed before a Magistrate Judge. With respect to the remainder of the Scheduling Order, after conferring with regard to counsel's respective trial, hearing and vacation schedules, it is requested that each of the dates in the Scheduling Order beginning with the date of July 1, 2002 be extended for 14 days. Thus, the Scheduling Order would be modified to provide the following deadlines:



NEUBERGER, QUINN, GIELEN, RUBIN & GIBBER, P.A.

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Moving for joinder of additional parties and amendment of pleadings

July 15, 2002

Plaintiff's Rule 26(a)(2) disclosures

re experts

July 29, 2002

Defendant's Rule 26(a)(2) disclosures

re experts

August 27, 2002

Plaintiff's rebuttal Rule 26A(a)(2)

disclosures re experts

September 10, 2002

Rule 26(e)(2) supplementation of

disclosures and responses

September 17, 2002

Discovery deadline:

submission of status report

October 11, 2002

Requests for admissions

October 18, 2002

Dispositive pretrial motions deadline

November 1, 2002

Respectfully,

Price O. Gielen

Prin Sila

POG:pd

agraved (k. 1864) 41) 5-21-02

Neuberger, Quinn, Gielen, Rubin & Gibber, P.A.

Honorable Catherine C. Blake May 21, 2002 Page Three

cc: J. Brian Cashmere, Esquire Kathleen Olden Barnes, Esquire Justin Hawkins, Esquire (By Fax Machine – 703-893-8029)

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